

F I L E D  
Clerk  
District Court

SEP 24 2007

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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6 Attorneys for United States of America

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8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN MARIANA ISLANDS

11	UNITED STATES OF AMERICA,	)	Criminal Case No. 07-00014-001
12	Plaintiff,	)	GOVERNMENT'S MOTION FOR
13	v.	)	SUBSTANTIAL ASSISTANCE
14	ANTONIETA BONIFACIO AGUON,	)	DEPARTURE UNDER U.S.S.G. § 5K1.1
	Defendant.	)	AND 18 U.S.C. § 3553(e)

15 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its counsel,  
16 Leonardo M. Rapadas, United States Attorney, and Eric S. O'Malley, Assistant United States Attorney,  
17 and hereby moves the Court, pursuant to United States Sentencing Guidelines § 5K1.1 and  
18 18 U.S.C. § 3553(e), to depart from the Sentencing Guidelines based on the defendant's substantial  
19 assistance to the Government. The Government recommends that the Court depart downward to  
20 advisory Guidelines **Level 15**.

21 The Government intends to make its specific recommendation at the sentencing hearing.

22 LEONARDO M. RAPADAS  
United States Attorney  
23 Districts of Guam and the N.M.I.

24 Date: September 24, 2007

25 By:

  
ERIC S. O'MALLEY  
Assistant United States Attorney